



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

July 9, 2007

Reply To
Attn Of: ETPA-088

Ref: 04-012-AFS

Carol Hughes
Survey and Manage SEIS Team
PO Box 2965
Portland, Oregon 97208-2965

Dear Ms. Hughes:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Supplement to the 2004 Supplemental Environmental Impact Statement (FSEIS) to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

The FSEIS combines supplemental analyses conducted in 2006 and 2007 examining the environmental effects of a proposal by the Forest Service and Bureau of Land Management (the Agencies) to remove or modify the Survey and Manage Standards and Guidelines of the Northwest Forest Plan. The document examines four alternatives. Alternative 1, the no-action alternative, would continue implementation of the Survey and Manage program. Alternative 2, the proposed action, would amend Agencies' guidelines in the NWFP area to remove the Survey and Manage mitigation requirements from the NWFP. Under this alternative, species that qualified would receive treatment under the Agencies' special status species programs (SSSP). Alternative 3 would amend the Agencies' guidelines to modify the Survey and Manage measures. Alternative 4 is a second No Action Alternative designed to reflect the potential implications of a recent court decision relative to Alternative 1.

EPA did not object to the 2006 and 2007 draft supplemental analyses, finding that they supported both the utilization of the Special Status Species Programs and previous determinations made as a part of the Annual Species Review Process. EPA did, however, note the importance of the reserve system and other Standards and Guidelines of the Northwest Forest Plan in providing for a reasonable assurance of species persistence. Given this, EPA suggested that changes to the existing reserve strategy may require revision of the habitat outcomes predicted for Survey and Manage species in the SEIS.

The FSEIS gives some treatment to this topic in the cumulative impacts section, stating on page 112 that "if one has to consider possible future changes to a plan while analyzing the proposed plan itself, the analysis could never be completed because such an analysis would be

circular.” EPA recognizes the difficulty presented by this kind of analysis, but we also remain concerned for species such as the Red Tree Vole (RTV), whose persistence in the Mesic zone (where it is not currently included on any sensitive species list) is attributable to the large size of the Late Successional Reserves and the connectivity provided by Riparian Reserves. Were that reserve structure to change, vole populations could be negatively impacted. This, in turn, could have implications for the broader RTV population, given its relative instability in the Xeric Zone and the northern Cascades and north coast portions of the Northern Mesic Zone (2006 SEIS). Given the potential habitat and species ramifications of such a change, we continue to encourage the Agencies to make every effort to consider any reasonably foreseeable reserve network or management changes when predicting habitat outcomes.

In our previous comments, EPA also encouraged the Agencies to avail themselves of the knowledge gained through the Survey and Manage Program as they implement their Sensitive Status Species Programs (SSSP). The FSEIS provides a good summary of the SSSP program strategies and requirements (pages 40-48), but does not talk specifically to this point. We recommend that the record of decision include a discussion of how the SSSP will take advantage of the known site database, distribution maps, science documents, management guidelines, survey protocols, and conservation strategies that were pioneered through the Survey and Manage program.

EPA appreciates the opportunity to provide comments on the Survey and Manage FEIS. If you have any questions please contact Teresa Kubo at (503) 326-2859 or myself at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

cc: Laura Fujii, EPA Region 9